



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

April 21, 2014

U.S. Army Corps of Engineers
Mobile District
Attention: Dr. Susan I. Rees (CESAM-PD)
109 St. Joseph Street
Mobile, AL 36602

Subject: EPA Comments on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Mississippi Coastal Improvements Program (MsCIP) Comprehensive Barrier Island Restoration. Hancock, Harrison, and Jackson Counties, Mississippi
CEQ #: 20140060 and ERP#: COE-E39075-MS

Dear Dr. Rees:

Pursuant to Section 309 of the Clean Air Act, and Section 102(2)(c) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) reviewed the subject document. As a cooperating agency on the project, EPA participated in interagency meetings, interim document reviews and a public workshop meeting on April 3, 2014. The purpose of this letter is to provide you with EPA's Draft Supplemental Environmental Impact Statement (DSEIS) comments on the proposed project.

EPA commends the U.S. Army Corps of Engineers, Mobile District (COE) for your planning and coordination efforts on this project. The subject document is a supplement to the Mississippi Coastal Improvements Program (MsCIP) Comprehensive Plan and Integrated Programmatic Environmental Impact Statement (PEIS) (USACE, 2009a). The MsCIP PEIS evaluated measures to promote the recovery of coastal Mississippi from the hurricanes of 2005 and to increase the resilience of the coast against damage from future storms. The PEIS recommended a number of important elements for phased implementation over a 30–40 year period including the comprehensive restoration of the Mississippi barrier islands.

EPA recognizes that sea level rise is the primary driver of coastal land loss, but storms are the means of sediment redistribution and land loss along the Mississippi Gulf Coast. The DSEIS proposes to restore part of the Mississippi barrier islands in the Gulf of Mexico by placing sand within the National Park Service (NPS) Gulf Islands National Seashore (GUIS), Mississippi units. This action is intended to address the consequences of previous hurricanes and navigational dredging activities that altered sediment transport along the islands.

The DSEIS evaluates a No-Action alternative and a Tentatively Selected Plan (TSP) Alternative for restoring the Mississippi barrier island system. The TSP Alternative includes the restoration of Ship Island, the placement of beach-front and dune sand along Cat Island and the management of maintenance dredged material from the Pascagoula Ship Channel. Within this alternative, the DSEIS also evaluates alternative sand borrow areas including the preferred Borrow Site Option (BS Option 4), site-specific options for restoration at the sand placement locations authorized for construction, and specification of sand quantity for the Cat Island restoration, engineering and design alternatives, and construction methods.

According to the DSEIS, approximately 22 million cubic yards (mcy) of sand will be placed on the barrier island or within the littoral transport system. Specifically, the Ship Island restoration involves directly placing about 13.5 mcy of sand between East Ship Island and West Ship Island to fill a 3.5-mile breach in Camille Cut and placing 5.5 mcy of sand along the southern shoreline of East Ship Island to replenish sand and build up the island. The total fill encompasses 1,500 acres with 800 acres above the Mean High Water Level (MHWL). The sand used in these areas would be dredged from five main borrow areas offshore from Ship Island, Petit Bois Pass (AL, MS, OCS) and Horn Island Pass.

The Cat Island dune and beach restoration plan involves placing natural dune vegetation and 2 mcy of sand found off the eastern shoreline of Cat Island directly on the eastern shoreface of Cat Island. The total fill area encompasses 305 acres which should restore the island to 1998 conditions. In addition, future dredge material from the Pascagoula Navigation Channel Horn Island Pass Segment is now proposed for disposal between Disposal Area 10 (DA-10) and the south end of Pascagoula Harbor littoral zone placement site where it can contribute to littoral transport.

According to the DSEIS, implementation of the TSP will result in negative and beneficial impacts to placement and borrow areas and to the area users. "These impacts include the permanent loss of open water habitat at Camille Cut, construction-related disruptions to birds and other wildlife of Ship and Cat Islands, and construction-related disruptions to public use of borrow and placement areas." However, the DSEIS indicates that "the overall significant long-term system-wide benefits to the ecosystems, as well as economic benefits associated with damages and economic losses avoided and regional economic benefits, outweigh the negative impacts. The restoration of the islands, with important economic, recreational, environmental and aesthetic benefits, help maintain and sustain Mississippi Sound and the coastal mainland."

In addition, "restoration would provide additional nesting habitat for threatened and endangered sea turtles and over-wintering critical habitat for the piping plover as well as habitat for neotropical migrants and waterfowl. Closure of Camille Cut would help maintain the salinity regime in the Sound and the habitat conditions for oysters and numerous estuarine dependent fish and crustacean species that are essential for commercial and recreational fishing." "In addition, the barrier island restoration would contribute to continued protection of the significant historical and cultural sites within the GUIS. The anticipated reduction in storm surges would also help to protect unique coastal mainland habitats, wetlands, and special aquatic sites (including the Grand Bay NERR)."

EPA supports the need to protect and maintain the estuarine ecosystem of Mississippi Sound, reduce the amount of storm damage incurred along the mainland coast of Mississippi, and preserve and protect the Mississippi barrier islands and their natural and cultural resources. We note that the DSEIS identifies a long-term solution for island restoration by adding large volumes of beach quality sand back into the littoral sediment transport system to nourish adjacent barrier islands and mitigate land losses. We also note that the TSP will result in 800 acres of new habitat on Ship Island, 305 acres of new habitat on Cat Island, 762 acres of foraging habitat for wintering birds, 93.39 acres marine intertidal wetland created, and a 0.2-1.25 meter wave height reduction on the mainland. On the other hand, 25.57 acres marine and estuarine intertidal wetland will be lost, 39 acres of designated piping plover critical habitat will be unavailable during construction, 511 acres of Gulf sturgeon critical habitat in Camille cut will be lost by filling Camille cut and a path for crossing of nesting turtles will be also be affected. In addition, resident birds and breeding migrants will be disrupted, infaunal species submerged and epifaunal invertebrates displaced. Other species such as benthic, non-motile mollusks and amphipods should recover over time.

Some uncertainty remains regarding the impact of prolonged and uninterrupted construction activities on SHIP Island over a minimum period of 2.5 years. Approximately 1,500 acres of habitat will not be useable during this period. Many of the impacts discussed in the document are described as short-term because after construction is complete the environment is assumed to return to normal. However, it is unclear what the impacts of no nesting, no spawning, no benthic community have on populations, or reduced dissolved oxygen and increased turbidity may mean for fishing in the area (i.e., ship island) during this period. It is also unclear in some cases the extent of the turbidity plumes. EPA notes that it would be helpful to be able to review both the monitoring and adaptive management plan which may include routine monitoring and adaptive strategies should certain events occur and possibly the biological opinion to ensure that every effort is being made to further avoid or minimize impacts to spawning fish or foraging birds in the impact zone.

EPA understands that the COE coordinated with the tribes on cultural resources with the project area. However, uncertainty now exists with the value placed on the resource in the area. The Final Supplemental Environmental Impact Statement (FSEIS) should include any additional tribal coordination efforts or changes to the resource designations (i.e., sacred sites).

Again, EPA supports efforts to protect the Mississippi Gulf Coast from future storm damage by restoring the Mississippi Barrier Islands. Based on our analysis of the proposed action, EPA rates this DSEIS as EC-1 -i.e., EPA has "Environmental Concerns." EPA's rating system can be found online at: <http://www.epa.gov/oecaerth/nepa/comments/ratings.html>. The rating is based on the need to ensure that natural resource concerns such as water quality and impacts to fish and wildlife species are fully addressed in the monitoring and adaptive management plan. EPA understands the monitoring and adaptive management plan and the biological opinion, which are key components to addressing remaining resource questions, are being completed with assistance from federal agencies such as the National Park Service and U.S. Fish and Wildlife Service. According to the COE, this information will be available soon for interagency review and should help resolve any remaining issues that we may have.

Thank you for the opportunity to comment on this project. If you have any questions or require technical assistance, please contact Ntale Kajumba of my staff at (404) 562-9620, Calista Guthrie from the Wetlands Program Staff at (404) 562-9288 or John Bowie of the Gulf of Mexico Program Office at (228) 688-3888.

Sincerely,

A handwritten signature in dark ink, reading "Ramona K. McConney for". The signature is written in a cursive, flowing style.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Environmental Accountability